

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GREGORY COLBURN, et al.,

Defendants.

Cr. No. 19-10080-NMG

**DEFENDANT JOHN WILSON'S ASSENTED-TO
MOTION FOR LEAVE TO FILE SUR-REPLY BRIEF REGARDING
NON-PARTY UNIVERSITY OF SOUTHERN CALIFORNIA'S
REPLY IN SUPPORT OF MOTION TO QUASH**

The University of Southern California ("USC") is moving to quash the trial subpoena seeking gift receipts of 18 families from Defendant John Wilson. In its reply brief supporting its Motion to Quash Wilson's trial subpoena, USC mischaracterized Wilson's arguments and the testimony he seeks, and raised irrelevant concerns based on recent trial proceedings. Wilson therefore respectfully moves for leave to file a short sur-reply brief correcting a small number of USC's misstatements and clarifying his position. A copy of Wilson's proposed sur-reply brief is attached hereto. USC assents to this filing.

Respectfully submitted,

Counsel for John Wilson

/s/ Michael Kendall

Michael Kendall (BBO #544866)
Lauren Papenhausen (BBO# 655527)
WHITE & CASE LLP
75 State Street
Boston, MA 02109-1814
Telephone: (617) 979-9310
michael.kendall@whitecase.com
lauren.papenhouse@whitecase.com

Andrew Tomback (pro hac vice)
MC LAUGHLIN & STERN, LLP
260 Madison Avenue
New York, NY 10016
Telephone: (212) 448-1100
ATomback@mclaughlinstern.com

Date: September 24, 2021

CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1

The undersigned counsel hereby certifies that counsel for Defendant has conferred with counsel for USC and attempted in good faith to resolve or narrow the issues raised by this motion. USC assents to the relief requested.

/s/ Michael Kendall
Michael Kendall

CERTIFICATE OF SERVICE

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Michael Kendall
Michael Kendall